

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Robenson Jean-Pierre and Jean Metelus, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

J&L Cable TV Services, Inc.,

Defendant.

Civil Action No.: 1:18-cv-11499

**DECLARATION OF SHOSHANA SAVETT
IN SUPPORT OF PLAINTIFFS' MOTION
FOR CONDITIONAL CERTIFICATION
AND TO FACILITATE NOTICE UNDER
29 U.S.C. § 216(b)**

I, Shoshana Savett, declare:

1. I am a member in good standing of the bar of the Commonwealth of Pennsylvania, and I am admitted *pro hac vice* to this Court for this action.

2. I am an attorney with Berger Montague PC representing Plaintiffs in this case.

3. I have personal knowledge of the facts set forth in this Declaration and, if called upon as a witness, I could and would testify competently as to these facts.

4. This Declaration is submitted in support of Plaintiffs' Motion for Conditional Certification and to Facilitate Notice under 20 U.S.C. § 216(b), filed in *Jean-Pierre, et al. v. J&L Cable TV Services, Inc.*, Civil Action No. 1:18-cv-11499.

5. Attached as Exhibit A is a true and correct copy of the declaration of named Plaintiff Robenson Jean-Pierre, executed on December 4, 2018, provided in support of Plaintiffs' Section 216(b) Motion.

6. Attached as Exhibit B is a true and correct copy of the declaration of named Plaintiff Jean Metelus, executed on December 4, 2018, provided in support of Plaintiffs' Section 216(b) Motion.

7. Attached as Exhibit C is a true and correct copy of the declaration of opt-in Plaintiff Esty Cajuste, executed on December 4, 2018, provided in support of Plaintiffs' Section 216(b) Motion.

8. Attached as Exhibit D is a true and correct copy of the declaration of opt-in Plaintiff Moise Leveille, executed on December 4, 2018, provided in support of Plaintiffs' Section 216(b) Motion.

9. Attached as Exhibit E is a true and correct copy of the declaration of opt-in Plaintiff Markenson Morinvil, executed on December 4, 2018, provided in support of Plaintiffs' Section 216(b) Motion.

10. Attached as Exhibit F is a true and correct copy of the declaration of opt-in Plaintiff Jean Frederique, executed on December 4, 2018, provided in support of Plaintiffs' Section 216(b) Motion.

11. Attached as Exhibit G is a true and correct copy of the April 4, 2017 Text Order in *Sigui v. M&M Commc'ns, Inc.*, No. CV 14-442 (D.R.I.).

12. Attached as Exhibit H is a true and correct copy of the June 4, 2008 Electronic Order, the June 11, 2008 Electronic Order to approve Notice, and the June 10, 2008 Notice in *Benoit v. Tri-Wire Eng'g Sols., Inc.*, No. CV 07-30237 (D. Mass.).

13. Attached as Exhibit I is a true and correct copy of the August 31, 2017 Order in *Soto v. O.C. Communications*, No. 17-cv-00251 (N.D. Cal.).

14. Attached as Exhibit J is a true and correct copy of the text of the Notice of Collective Action Lawsuit Plaintiffs are proposing in connection with their Section 216(b) motion.

15. Attached as Exhibit K is a true and correct copy of the text of the Opt-In Consent Form Plaintiffs are proposing in connection with their Section 216(b) Motion.

16. Attached as Exhibit L is a true and correct copy of the text of the short form Notice of Collective Action Lawsuit Plaintiffs are proposing to text via cellphone in connection with their Section 216(b) motion.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and is based upon my own personal knowledge.

Executed: December 6, 2018

/s/ Shoshana Savett
Shoshana Savett